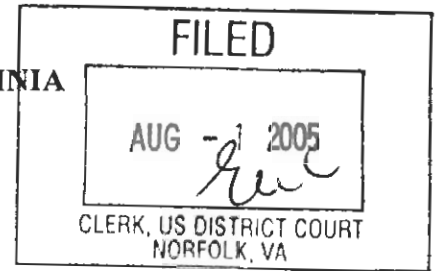


**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**



**INLINE CONNECTION CORPORATION,** )

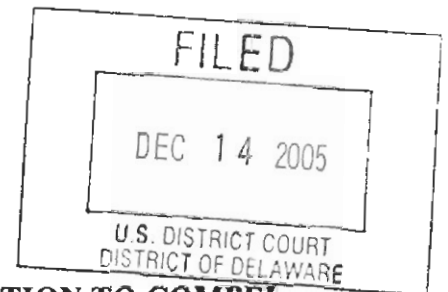
**Plaintiff,** )

**v.** )

**VERIZON INTERNET SERVICES,** )  
**INC., et al.** )

**Defendants.** )

**CIVIL ACTION NO. 02:05 CV 205 HCM**



**PLAINTIFF INLINE CONNECTION CORPORATION'S MOTION TO COMPEL  
RESPONSES TO INLINE'S FIRST SETS OF REQUESTS FOR PRODUCTION AND  
INTERROGATORIES**

Plaintiff Inline Connection Corporation ("Inline"), by counsel, hereby moves this Court, pursuant to Federal Rules of Civil Procedure 26(b)(1) and 37(a)(2)(B), and Local Civil Rule 37(A), to (1) overrule Defendants GTE.NET LLP, Verizon Internet Services, Inc., Verizon California Inc., Verizon Florida Inc., Verizon Hawaii Inc., Verizon North Inc., Verizon Northwest Inc., Verizon West Coast Inc., GTE Southwest Inc. d/b/a Verizon Southwest, Contel of the South d/b/a Verizon Mid-States, Verizon Delaware Inc., Verizon Maryland Inc., Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon Pennsylvania Inc., Verizon Washington, D.C. Inc., Verizon West Virginia, Inc., Telesector Resources Group, Inc. d/b/a Verizon Services Group, Verizon Corporate Services Group Inc. d/b/a Verizon Services Group, Verizon Advanced Data Inc., Verizon Avenue Corp., Verizon South Inc., Verizon Virginia, Inc., and Verizon Services Corp.'s objections to Inline's First Set of Requests for Production of Documents and Things (RFPs), and Interrogatories (Rogs); (2) compel each and

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every Defendant to respond in full to Inline's RFPs 1-8, 10-13, 15-41, and 43-84 within 14 days of the Court's Order on this Motion; and (3) compel each and every Defendant to provide full answers to Inline's Rqs 1-12 within 14 days of this Court's Order on this Motion.

This Motion is based upon and supported by the accompanying Memorandum and the Declaration of Andrew C. Byrnes, and any oral argument or further briefing the Court may permit.

Pursuant to Local Rule 37(E), Inline certifies that it conferred through counsel in good faith to resolve the discovery matters at issue.

**INLINE CONNECTION CORPORATION**

By  \_\_\_\_\_  
Of Counsel

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Attorneys for Inline Connection Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of August 2005, a true copy of the foregoing was sent by hand and via e-mail to:

Robert W. McFarland, Esq.  
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And *via* e-mail and Federal Express to:

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Washington, DC 20006

A handwritten signature in dark ink, appearing to be 'JBW', is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

8/1/05 3:33 PM (::ODMA\PCDOCS\DOCSNEK\1003075\1)

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

<b>INLINE CONNECTION CORPORATION,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO. 02:05 CV 205 HCM</b>
	)	
<b>VERIZON INTERNET SERVICES, INC., et al.</b>	)	
	)	
<b>Defendants.</b>	)	

**(PROPOSED) ORDER GRANTING PLAINTIFF INLINE CONNECTION  
CORPORATION'S MOTION TO COMPEL RESPONSES TO INLINE'S FIRST SETS  
OF REQUESTS FOR PRODUCTION AND INTERROGATORIES**

The Court, having considered the parties' submissions regarding Plaintiff Inline Connection Corporation's ("Inline") Motion to Compel Responses to Inline's First Sets of Requests for Production and Interrogatories, hereby ORDERS as follows:

1. Defendants' objections to responding to Inline's requests for production and interrogatories are overruled.
2. Each Defendant must respond in full to Inline's RFPs 1-8, 10-13, 15-41, 43-84 no later than 14 days after the date of this Order.
3. Each Defendant must provide full answers to each and every one of Inline's interrogatories 1-12 no later than 14 days after the date of this order.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2005.

\_\_\_\_\_  
United States Magistrate Judge  
Tommy E. Miller